

APPLICANTS: Christian L. Kuiawa et al.
U.S.S.N.: 09/924,050

REMARKS

Amendments to the Claims

Claims 1-18 are pending; of these, claims 1, 7, and 13 are independent. Minor amendments are made to claims 7 and 13, the bases of which are self-evident.

Each of the grounds for rejection cited in the Office Action is addressed below, under an appropriate sub-heading.

35 U.S.C. §103

The United States Patent and Trademark Office rejected each of the pending claims under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,219,703 B1 (Nguyen) in view of U.S. Patent No. 5,961,604 (Anderson).

A comparison of each of the independent claims with these two references is provided, below.

A) Claims 1-6:

Claim 1 is directed to a method involving a plurality of uninterruptible power supply (UPS) devices, comprising, *inter alia*, the following steps: storing a plurality of configuration profiles, selecting configuration profiles for UPS devices to be managed and transmitting the settings for those configuration profiles to the UPS devices. Accordingly, this method is geared toward configuring UPS devices on the network level where multiple UPS devices are employed.

The United States Patent and Trademark Office indicated that Nguyen discloses a method similar to claim 1, though Nguyen “does not expressly disclose wherein the device is a UPS device.” The United States Patent and Trademark Office, nevertheless, points to Anderson to supply this missing piece, reaching the following conclusion:

Anderson expressly discloses that a network device can be a power supply device, for example an UPS device. Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to configure and manage a plurality of UPS devices by utilizing the technique disclosed by Nguyen.

Office Action, page 4.

Notwithstanding these assertions, Applicants' respectfully submit that a step is still missing from these references to provide a suggestion or motivation for combining their teachings to produce the method of claim 1. Specifically, Anderson discloses an apparatus, wherein management of network devices is provided as follows.

Each network device is provided with a server/interface module containing [a] device specific application for that particular network device. The device specific application contains a database of status and control information associated with its associated network device.

Anderson, Col. 1, lines 34-38. Accordingly, in Anderson, the devices are managed at a local level (rather than at a network level), *e.g.*, as shown in FIG. 4, and as is further discussed at Col. 3, lines 16-33, and at Col. 6, lines 53-67. Absent any suggestion of configuring a multiplicity of UPS devices at a *network level* either in Nguyen or in Anderson, there is no motivation or suggestion of applying the teachings of Nguyen to the configuration of a plurality of UPS devices in a systematized manner. While Nguyen specifically discloses the use of its method for the management of a router, Nguyen does not suggest the application of its method for devices (specifically, UPS devices) that, unlike routers, are not traditionally configured at the network level in the manner described.

Absent a suggestion of configuring a plurality of UPS devices at a network level in the prior art, Applicants respectfully submit that there is no suggestion or motivation in the prior art for recognizing a UPS device as the type of network device to be managed via the method of Nguyen. Accordingly, Applicants respectfully request that this rejection against claim 1, and against claims 2-6, which depend therefrom, be reconsidered and withdrawn.

B) Claims 7-12:

Claim 1 is directed to a computer comprising, *inter alia*, a plurality of configuration profiles and a list of UPS devices to be managed, wherein the computer is configured to perform the above-recited steps from claim 1. Like claim 1, the subject matter of this claim is similarly directed toward use in an environment wherein a plurality of UPS devices are systematically configured at a network (rather than local) level.

For the reasons stated, above, neither Nguyen nor Anderson suggest the configuration of a plurality of UPS devices at a network level. Absent a suggestion of such a network-level

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configuration setup, Applicants respectfully submit that there is likewise no suggestion of or motivation for the computer apparatus of claim 7.

In the absence of this suggestion or motivation in the prior art., Applicants respectfully requests that this rejection against claim 7 and against claims 8-12, which depend from claim 7, be reconsidered and withdrawn.

C) Claims 13-18:

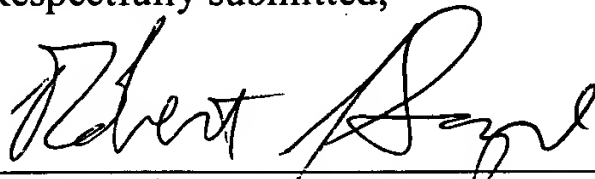
Claim 13, as amended, is directed to an apparatus for configuring a plurality of UPS devices coupled to a network, the apparatus comprising, *inter alia*, memory in which a plurality of configuration profiles and a list of UPS devices to be managed are stored.

Because neither Nguyen nor Anderson disclose, suggest or motivate the management of a plurality of UPS devices via a single apparatus, Applicants respectfully submit that the prior art does not render obvious the inclusion in memory of a list of multiple UPS devices to be managed as specified in amended claim 13. Accordingly, Applicants respectfully request that this rejection against claim 13, and against claims 14-18, which depend therefrom, be reconsidered and withdraw.

CONCLUSION

On the basis of the foregoing amendments, Applicants respectfully submit that the pending claims are in condition for allowance. If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,



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